

MAR 22 2007

Applicant : Adam J. Weissman et al.
Serial No. : 10/748,399
Filed : December 30, 2003
Page : 13 of 20

Attorney's Docket No.: 16113-422001 / GP-161-00-US

REMARKS

Claims 1-42 are pending. Claims 1, 12, 20, 31, and 41 are in independent form.

The supplemental response is submitted under the provisions of 37 C.F.R. § 1.116. Many of the amendments to the claims herein render the Remarks in the Amendment and Response filed January 22, 2007 moot and/or inapplicable. Applicant hereby expressly disclaims the Remarks in the Amendment and Response filed January 22, 2007 and prays that examination proceed based on the Amendments and Remarks herein.

CLAIMS 1 AND 20

In the action mailed November 22, 2006, claims 1 and 20 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 6,101,515 to Wical et al. (hereinafter "Wical").

As amended, claim 1 relates to a method that includes receiving, from a user, a primary term representing a first concept to be added to a network of interrelated concepts, receiving, from a user, at least one related term associated with the primary term and the first concept, representing the association between the primary term and the at least one related term to the user on a user interface characterizing the first concept, receiving at least one relationship between the first concept and a second concept, receiving a relationship type characterizing the at least one relationship, receiving a strength value characterizing the at least one relationship, representing the at least one relationship and the relationship type to the user on the user interface, receiving a second user request to add the first concept to the network, and in response to the second user request, adding the first concept to the network. A concept comprises a normalized semantic representation.

Applicant : Adam J. Weissman et al.
Serial No. : 10/748,399
Filed : December 30, 2003
Page : 14 of 20

Attorney's Docket No.: 16113-422001 / GP-161-00-US

As amended, claim 20 relates to one or more computer-readable media comprising program code tangibly embodied in machine-readable format and operable to cause one or machines to perform operations. The operations include activities that are related to those recited in claim 1.

Wical neither describes nor suggests features recited in claims 1 and 20. For example, Wical neither describes nor suggests that both a primary term representing the first concept and at least one related term associated with the primary term and representing the first concept are received from a user. As another example, Wical neither describes nor suggests that an association between a primary term and at least one related term, along with a relationship between a first concept and a second concept, be represented to a user on a user interface, as recited in claims 1 and 20.

In this regard, Wical describes a system for the automated learning and classification of terminology. *See, e.g., Wical*, col. 1, line 12-14. According to Wical, automated terminology learning/classification systems attempt to understand terminology in the context of one or more documents. *Id.*, col. 1, line 17-19; col. 3, line 14-17.

Most of the automated learning and classification described by Wical appears to be done in the absence of interaction with a human user. For example, Wical disparages the manual classification of terminology by lexicographers as inefficient and a hardship. *Id.*, col. 6, line 49-54. There are, however, limited exceptions to the exclusion of human users from the automated learning and classification. For example, Wical describes that his learning system can receive user input specifying terms to be learned. *Id.*, col. 9, line 33-35. As another example, a user can manually check categorization results and re-categorize terms or phrases. *Id.*, col. 17, line 5-10.

Applicant : Adam J. Weissman et al.
Serial No. : 10/748,399
Filed : December 30, 2003
Page : 15 of 20

Attorney's Docket No.: 16113-422001 / GP-161-00-US

Such manual checks can be performed over a user interface that allows a user to select a number of terms for which the user desires to manually verify. *Id.*, col. 17, line 26-28. After selection, the terms can be displayed to the user in their category so that the user can identify inconsistencies. *Id.*, col. 17, line 31-33.

As a threshold matter, Wical deals with the learning and classification of terminology. The former rejections have been based, at least in part, on an assertion that such terminology constitutes "concepts," as recited in the claims. Applicant respectfully disagrees and instead submits that one of ordinary skill would not consider terminology to be equivalent to concepts. For example, a concept can be represented by multiple terms, where terminology is individual words or phrases. *See, e.g., specification*, para. [0005]; *Wical*, col. 3, line 14-17.

Indeed, Wical himself acknowledges this distinction. For example, Wical describes that a knowledge catalog 150 includes a set of static ontologies. *See, e.g., Wical*, col. 7, line 37-39. These static ontologies provide views of views, characterizations, and organizations of concepts or categories. *Id.*, col. 7, line 39-42. However, the classification of Wical's terminology is not understood to involve the addition of concepts or categories to such ontologies, which are consistently described as "static." Although Applicant believes that this was inherent in the pending claims, the claims have nevertheless been amended to highlight that concepts comprise a "normalized semantic representation," rather than the terminology that Wical learns and classifies.

Moreover, even if one were to consider the terminology that is learned and classified in Wical to constitute a "concept" as recited in claims 1 and 20, Wical neither describes nor suggests that that both a primary term representing the first concept and at least one related term

Applicant : Adam J. Weissman et al.
Serial No. : 10/748,399
Filed : December 30, 2003
Page : 16 of 20

Attorney's Docket No.: 16113-422001 / GP-161-00-US

associated with the primary term and representing the first concept are received from a user, as recited. Instead, Wical is understood to limit user interaction to input specifying individual terms that are to be learned. Such individual terms do not represent the same first concept. Moreover, there is no indication that such individual terms are associated with one another, except perhaps, by happenstance. Applicant respectfully submits that such happenstance is an insufficient basis to form an anticipation rejection.

Further, even if individual terms that were input over Wical's user interface were, by happenstance, associated with one another, Wical neither describes nor suggests that an association between a primary term and at least one related term, along with a relationship between a first concept and a second concept, be represented to a user on a user interface. As discussed above, the rejection glosses over any distinction between concepts and terminology, and interaction with a user in Wical is limited. Although Wical describes that terms can be displayed to a user in their category, Wical seems oblivious to the potential happenstance of these terms being associated with one another and hence neither describes nor suggests that such associations be displayed.

Accordingly, claims 1 and 20 are not anticipated by Wical. Applicant respectfully requests that the rejections of claims 1, 20, and the claims dependent therefrom be withdrawn.

CLAIMS 12 AND 31

Claims 12 and 31 were rejected under 35 U.S.C. § 102(b) as anticipated by Wical.

As amended, claim 12 relates to a method that includes receiving a request to edit a first concept in a network of interrelated concepts, representing the first concept on a display that includes a collection of one or more terms that express the first concept and a description of one

Applicant : Adam J. Weissman et al.
Serial No. : 10/748,399
Filed : December 30, 2003
Page : 17 of 20

Attorney's Docket No.: 16113-422001 / GP-161-00-US

or more existing relationships between the first concept and other concepts in the network, receiving, from a user, at least one new relationship between the first concept and a second concept, receiving a relationship type characterizing a type of the at least one new relationship, receiving a strength value characterizing a strength of the at least one new relationship, updating the first concept to reflect the at least one new relationship, the relationship type, and the strength value, and representing the updated first concept on the display, wherein the display further includes a description of the at least one new relationship. A concept comprises a normalized semantic representation.

As amended, claim 31 relates to one or more computer-readable media comprising program code tangibly embodied in machine-readable format and operable to cause one or machines to perform operations. The operations include activities that are related to those recited in claim 12.

Wical neither describes nor suggests features recited in claims 12 and 31. For example, Wical neither describes nor suggests receiving a request to edit a first concept in a network of interrelated concepts, as recited in claims 12 and 31. As another example, Wical neither describes nor suggests that a first concept be represented on a display that includes a collection of one or more terms that express the first concept and a description of one or more existing relationships between the first concept and other concepts in the network, as recited in claims 12 and 31.

In this regard, as discussed above, Wical's system is for the automated learning and classification of *terminology*, and most of this automated learning and classification appears to be done in the absence of interaction with a human user. One exception to this is the manual

Applicant : Adam J. Weissman et al.
Serial No. : 10/748,399
Filed : December 30, 2003
Page : 18 of 20

Attorney's Docket No.: 16113-422001 / GP-161-00-US

checking of categorization results from a learning system for the re-categorization of terminology. Such an automated learning and classification of terminology, and the re-categorization of terminology, is not relevant because it neither describes nor suggests editing a first concept in a network of interrelated concepts. Indeed, Wical describes that knowledge catalog 150 is to include a set of *static* ontologies. Since these ontologies are static, it would appear requests to edit them are outside the scope of Wical's disclosure.

The rejections do not contend that Wical has anything to do with the editing of these static ontologies. Instead, the rejections contend that the re-categorization of terminology constitutes the editing of a concept, as recited in claims 12 and 31. Applicant respectfully disagrees and instead submits that one of ordinary skill would not consider "terminology" to be equivalent to "concepts," especially in light of Wical's acknowledgement of the distinctions therebetween. As before, the claims have been amended to highlight that concepts comprise a "normalized semantic representation," rather than the terminology that Wical learns and classifies.

Moreover, even if one were to consider the terminology that is learned and classified in Wical to constitute a "concept" as recited in claims 12 and 31, Wical neither describes nor suggests that a first concept be represented on a display that includes a collection of one or more terms that express the first concept and a description of one or more existing relationships between the first concept and other concepts in the network, as recited in claims 12 and 31. In this regard, if Wical's "terminology" is taken to be a "concept," how can a collection of one or more terms that express Wical's "terminology" be represented on a display?

Applicant : Adam J. Weissman et al.
Serial No. : 10/748,399
Filed : December 30, 2003
Page : 19 of 20

Attorney's Docket No.: 16113-422001 / GP-161-00-US

Accordingly, claims 12 and 31 are neither described nor suggested by Wical. Applicant respectfully requests that the rejections of claims 12, 31, and the claims dependent therefrom be withdrawn.

NEW CLAIM 41

New claim 41 relates to a user display that includes a visual rendition of an identifier of a first concept in an ontology of concepts, a visual rendition of a collection of one or more terms that represent the first concept, and a visual rendition of relationships between the first concept and other concepts in the ontology. The visual rendition of the relationships comprises a first description that a first relationship between the first concept and a second concept is a parent/child relationship, a second description that a second relationship between the first concept and a third concept is a child/parent relationship, and a third description that a third relationship between the first concept and a fourth concept is a lateral relationship. A concept comprises a normalized semantic representation.

Features in claim 41 are neither described nor suggested by Wical. For example, Wical neither describes nor suggest a visual rendition of a collection of one or more terms that represent a first concept.

Accordingly, Applicant respectfully requests that claims 41 and 42 be allowed.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue, or comment does not signify agreement with or concession of that rejection, issue, or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as

Applicant : Adam J. Weissman et al.
Serial No. : 10/748,399
Filed : December 30, 2003
Page : 20 of 20

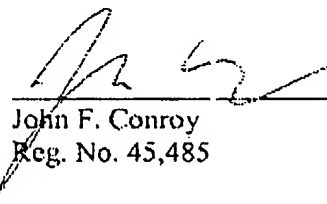
Attorney's Docket No.: 16113-422001 / GP-161-00-US

an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Please apply the excess claims fee, the extension of time fee, and any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: March 22, 2007



John F. Conroy
Reg. No. 45,485

Fish & Richardson P.C.
PTO Customer No. 26192
12390 El Camino Real
San Diego, California 92130
Telephone: (858) 678-5070
Facsimile: (858) 678-5099

10711387.doc